REMARKS/ARGUMENTS

This Amendment is in response to the final Office Action mailed March 23, 2010. Before this Amendment, claims 1-42, 44-48, and 50-68 were pending. In this Amendment, claims 32, 44, 59, and 65 have been amended, claims 1-31, 53-54, 57-58, and 61-64 are canceled, and no new claims are presented for consideration. After entry of this Amendment, which is respectfully requested, claims 32-42, 44-48, and 50-52, 55-56, 59-60, and 65-68 will be pending.

I. CLAIM REJECTIONS UNDER 35 U.S.C. § 103

The Office Action rejected all the pending claims (claims 1-42, 44-48, and 50-68) as being unpatentable under 35 U.S.C. § 103(a) over Lee (US 2002/0129024) (hereinafter "Lee") in view of Chung et al. (US 6,850,947) (hereinafter "Chung"). To establish a prima facie case of obviousness, there must be a teaching or suggestion to combine the references or it must be shown that it would have been obvious for one skilled in the art at the time of the invention to try the combination. Applicants respectfully traverse the rejections because the cited references fail to teach or suggest a motivation to combine the references, it would not have been obvious to combine the references as proposed in the Office Action, and that combining the references would not produce the claimed invention.

For example, claim 32 as amended recites in part:

> 32. A method of transforming data, the method comprising:
> positioning a definition pointer to point at a first compound transform definition within a transform process definition;
> invoking a first parallel processing thread to read the pointed at first compound transform definition;
> searching data to be transformed for a data element to be transformed, the search being responsive to the first compound transform definition;
> **calling a dynamic function** defined in the first compound transform definition, the dynamic function **located elsewhere from the definition pointer position**;

transforming any found data element into an output data file, responsive to the first compound transform definition and called dynamic function, a data structure of the output data file being responsive to a data structure of the transform process definition;

positioning a definition pointer to point at a second compound transform definition within the transform process definition;

invoking a second parallel processing thread to read the pointed at second compound transform definition;

searching data to be transformed for another data element to be transformed, the search being responsive to the second compound transform definition; and

transforming any found data element into the output data file, responsive to the second compound transform definition, the data structure of the output data file being responsive to the data structure of the transform process definition.

(emphasis added). Independent claims 44, 59, and 65 have been amended similarly. Support for the amendments is in the original application, for example in paragraphs [0042] and [0075] of the specification.

The Office Action avers that Lee FIG. 37 and paragraph [0302] teach a lookup table that contains data used for determining a specific output structure (Office Action p. 19). However, Lee fails to teach "calling a dynamic function . . . located elsewhere from the definition pointer position" as recited. Neither Lee FIG. 37, reproduced below, nor Lee paragraph [0302] teach a dynamic function as claimed.

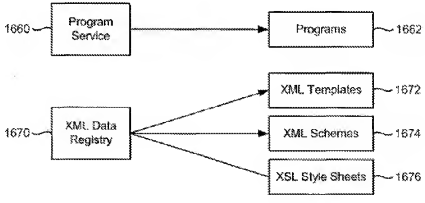

FIG. 37 of Lee (US 2002/0129024 A1)

Lee paragraph [0302] discusses XML data registry 1670, which points to XML templates, XML schemas, and XSL style sheets. XML data registry 1670 contains registration files that correspond to peripheral programs listed in program service 1660, but the XML data registry is not a compound transform definition as claimed. There is no teaching or suggestion that any of the XML templates, XML schemas, or XSL style sheets include dynamic functions as claimed.

In some embodiments, transformation code can be configurable for dynamic optimization of the transform process (Specification paragraph [0004]). A call to a dynamic function offers flexibility in determining output data by allowing much more complex, non-linear, and custom transformations of the input data into output data. For example, a function in an embodiment could determine that employees who are attorneys in California and have last names beginning with H-M and who have not graduated from law school in the last three years are required to attend a minimum continuing learning education seminar. Lee simply does not provide dynamic functions as claimed. Chung is directed toward concurrently reading data organized in non-overlapping data partitions from data stores using parallel processing and fails to cure the deficiencies of Lee.

Because neither Lee nor Chung teach or suggest each limitation in the claims, no combination of the references can render the claims unpatentable under § 103. For at least the above reasons, Applicants respectfully request withdrawal of the rejections of the claims and all claims depending therefrom.

II. AMENDMENTS TO THE CLAIMS

Unless otherwise specified or addressed in the remarks section, amendments to the claims are made for purposes of clarity and are not intended to alter the scope of the claims or limit any equivalents thereof. The amendments are supported by the specification and do not add new matter.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 925-472-5000.

Respectfully submitted,

Mark Mathison
Reg. No. 57,556

TOWNSEND and TOWNSEND and CREW LLP
Two Embarcadero Center, Eighth Floor
San Francisco, California 94111-3834
Tel: 925-472-5000
Fax: 415-576-0300
MPM:cta
62672003 v1